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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

NEETA THAKUR, <i>et al.</i> ,)	Case No. 25-cv-4737-RFL
Plaintiffs,)	
v.)	DECLARATION IN SUPPORT OF FEDERAL
)	DEFENDANTS' FOURTH ADMINISTRATIVE
)	MOTION FOR A STAY IN LIGHT OF LAPSE
)	OF APPROPRIATIONS
DONALD J. TRUMP, in his official capacity as)	
President of the United States, <i>et al.</i> ,)	Judge: Hon. Rita F. Lin
Defendants.)	
)	
)	
)	

I, Jason Altabet, declare as follows:

1. I am a Trial Attorney at the Federal Programs Branch in the United States Department of Justice, Civil Division. I have personal knowledge of the matters set forth below, except those matters that are based on information and belief, which I believe to be true, and could and would testify

DECL. ISO FED. DEFS' FOURTH STAY
MOTION CASE NO. 25-CV-4737

1 competently to them if called to do so. I make this declaration in support of the Federal Defendants’
2 Unopposed Fourth Administrative Motion, filed concurrently herewith.

3 2. I have been informed that I will be furloughed for the duration of the lapse in
4 appropriations. I am further informed that the National Institutes for Health (“NIH”) grants office will
5 be furloughed for the duration of the lapse in appropriations.

6 3. On October 23, 2025, I contacted Plaintiffs’ counsel regarding this motion. After
7 discussion, Plaintiffs’ counsel represented that Plaintiffs would graciously not oppose the stay of NIH’s
8 obligations in the manner set forth in the administrative motion on the condition that NIH commit to a
9 no-cost extension covering the period from the suspension/termination actions through the time of the
10 reinstatement for the grants that we are waiting on reinstating. NIH has agreed to those no-cost
11 extensions.

12 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
13 correct. Executed on October 27, 2025.

14 /s/ Jason Altabet
15 Jason Altabet
16 Trial Attorney, Federal Programs Branch
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